

The Honorable James L. Robart

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

MICROSOFT CORPORATION, a  
Washington Corporation,

Plaintiff,

v.

MOTOROLA, INC., MOTOROLA  
MOBILITY LLC, and GENERAL  
INSTRUMENT CORPORATION,

Defendants.

No. C10-1823-JLR

**[PROPOSED] ORDER GRANTING NON-  
PARTY MPEG LA LLC'S MOTION TO  
SEAL DOCUMENTS**

NOTE ON MOTION CALENDAR:  
FRIDAY, NOVEMBER 9, 2012

WITHOUT ORAL ARGUMENT

This matter having come on regularly before the above-entitled Court on Nonparty MPEG LA LLC's ("MPEG") Joinder and Motion to Seal documents and the Court having considered the joinder/motion papers and the records on file herein,

And the Court, being fully advised in the premises, now, therefore, it is hereby ORDERED, ADJUDGED and DECREED that MPEG's Joinder and Motion is Granted as follows:

1. MPEG has established that compelling reasons exist for sealing the following documents:

a. AVS Patent Portfolio License, dated January 24, 2005, between MPEG and Google Inc., labeled MPEG LA 000001-31;

[PROPOSED] ORDER GRANTING NON-PARTY MPEG LA LLC'S  
MOTION TO SEAL DOCUMENTS - 1  
(C10-1823-JLR)

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Seattle, WA 98101  
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- b. Agreement among Licensors Regarding the AVC Standard, dated June 15, 2004, between a number of entities, labeled MPEG LA - 000096-114;
- c. Agreement among Licensors regarding the AVC Standard, dated June 15, 2004, between a number of entities, labeled MPEG-MOT\_54-90 and Trial Exhibit 1141;
- d. Licensing Administrator Agreement Regarding the AVC Standard dated June 15, 2004, between a number of entities, labeled MPEG-MOT\_91-132 and Trial Exhibit 1636;
- e. Side letter, dated August 19, 2008, from MPEG to Motorola and considered as an attachment to a licensing agreement, labeled MPEG-MOT\_1474-1534 and Trial Exhibit 21;
- f. An email exchange between MPEG and Motorola, dated November 4 and December 10, 2009, concerning licensing issues, labeled MPEG-MOT\_1870-1871 and Trial Exhibit 22;
- g. All other correspondence that contains information relating to terms and specifics of the Licensing Agreements disclosed in response to subpoenas to MPEG, that the parties intend to offer into evidence at trial;

These documents are confidential and contain trade secret information. MPEG has done nothing to put that information at issue in this case where it is not a party. The parties and witnesses shall redact and seal the portion of any exhibits or demonstratives which contain the above referenced documents.

2. The courtroom is to be cleared and closed when argument on this topic, testimony on this topic, or these exhibits are discussed.

3. If additional documents from MPEG are intended to be offered into evidence then the parties are to notify MPEG immediately so that it can seek to seal/redact confidential and trade secret information before the document is offered into evidence.

DATED this \_\_\_\_\_ day of November, 2012.

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HONORABLE JAMES L. ROBART  
United States District Court Judge